



Wisconsin Power and Light Company

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April 1, 2009

**FILED ELECTRONICALLY & HAND DELIVERED**Ms. Sandra J. Paske  
Secretary to the Commission  
Public Service Commission of Wisconsin  
610 North Whitney Way  
P.O. Box 7854  
Madison, Wisconsin 53707-7854

**RE:      Joint Application of Wisconsin Power and Light  
          Company and Wisconsin Electric Power Company for  
          Certificate of Authority to Install a NO<sub>x</sub> Reduction      Docket No. 5-CE-137  
          System and Selective Catalytic Reduction (SCR), at the  
          Edgewater Generating Station Unit 5**

Dear Secretary Paske,

In compliance with the Notice of Technical Conference, dated March 27, 2009 (PSC REF#: 110520), in the above referenced docket, WPL is providing its Electric Generation Expansion and Analysis System (EGEAS) modeling and assumptions. WPL is also submitting an application for confidential treatment of this information.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Greiveldinger', written over a horizontal line.

Michael Greiveldinger  
Attorney

MSG/kmc

Enclosure(s)

cc:      Kira E. Loehr  
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Electronically (w/o enclosures)

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Electronically (w/o enclosures) & Overnight (w/ enclosures)

**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of Wisconsin Power and Light Company )  
and Wisconsin Electric Power Company for a )  
Certificate of Authority to Install a NO<sub>x</sub> Reduction )  
System, Selective Catalytic Reduction (SCR), at the )  
Edgewater Generating Station on Unit 5 )

Docket No. 5-CE-137

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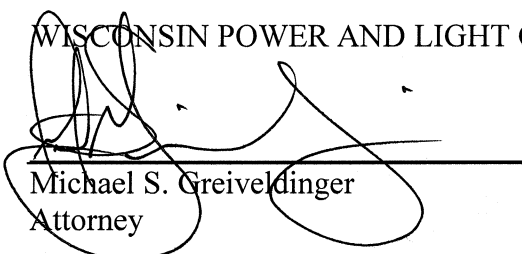
**APPLICATION OF WISCONSIN POWER AND LIGHT COMPANY  
FOR CONFIDENTIAL TREATMENT OF RECORDS**

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Wisconsin Power and Light Company ("WPL") respectfully submits to the Public Service Commission of Wisconsin ("Commission") this application for confidential status of WPL's Electric Generation Expansion Analysis System ("EGEAS") modeling and assumptions, as described more fully in the following affidavit of Mr. Joseph M. Holliman. WPL is providing the updated EGEAS data as an attachment to its response to the Notice of Technical Conference, dated March 27, 2009 (PSC REF#: 110520), in this docket. This motion is made pursuant to Wis. Stat. §§ 19.36(5) and 196.14, Wis. Admin. Code § PSC 2.12, and public policy supporting confidential treatment of records as outlined in *State ex rel. Youmans v. Owen*, 28 Wis. 2d 672, 137 N.W.2d 470 (1965), and is supported by the accompanying affidavit.

Dated this 31st day of March, 2009.

WISCONSIN POWER AND LIGHT COMPANY

  
\_\_\_\_\_  
Michael S. Greiveldinger  
Attorney

**AFFIDAVIT OF JOSEPH HOLLIMAN**

STATE OF WISCONSIN     )  
  ) ss.  
COUNTY OF DANE         )

Joseph M. Holliman, being first duly sworn, on oath, deposes and says:

1. I make this affidavit based upon my personal knowledge.
2. All of the information contained in this affidavit is true and correct to the best of my knowledge.

3. The name and address of the applicant seeking confidential treatment of information in this matter are as follows:

Wisconsin Power and Light Company ("WPL")  
4902 North Biltmore Lane  
P.O. Box 77007  
Madison, Wisconsin 53707-1007

4. I am the individual filing this affidavit on behalf of WPL. My name and position are as follows:

Joseph M. Holliman  
Senior Asset Strategy Consultant  
Alliant Energy Corporate Services, Inc.

5. Specific Type of Information for Which Confidential Status is Sought:

Attached to this Application is a true and correct copy of WPL's initial and updated EGEAS modeling and assumptions, which support the "Application of Wisconsin Power and Light Company and Wisconsin Electric Power Company for a Certificate of Authority to Install a Selective Catalytic Reduction System for Nitrogen Oxide Removal on Unit 5 at the Edgewater Generating Station, Sheboygan County, Wisconsin" (Docket No. 5-CE-137). WPL is providing

the EGEAS modeling and assumptions in response to the Notice of Technical Conference, dated March 27, 2009 (PSC REF#: 110520), which provides, in part, that “The applicants shall provide their EGEAS modeling and assumptions used to the parties and Commission staff by April 2, 2009.”

WPL originally provided EGEAS modeling and assumptions and updated EGEAS modeling and assumptions in its responses to Commission Data Request Nos. 1.16 and 3.22, respectively. In both instances, WPL filed the EGEAS information under request for confidential treatment.

The EGEAS modeling and assumptions include electric generation plant data on fuel prices, outage schedules, purchased power energy prices, and other sensitive information. WPL requests that the EGEAS modeling and assumptions—which are marked confidential and are being delivered to the Commission today—receive confidential treatment by the Commission.

6. Facts and Supporting Legal Authority Constituting Basis for Confidential Treatment:

Wis. Stat. § 196.14 allows the Commission to withhold from public inspection any information that would aid a competitor of a public utility in competition with that public utility. In addition, Wis. Stat. § 19.36(5) and Wis. Admin. Code § PSC 2.12(3) allow the Commission to withhold access to any record or portion of a record containing information qualifying as a trade secret. Trade secrets are defined in Wis. Stat. § 134.90(1)(c) as meaning information to which all of the following apply:

1. The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
2. The information is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.

To reiterate, the EGEAS information for which confidential treatment is being sought consists of specific electric generation plant data on fuel prices, outage schedules, purchased power energy prices, and other sensitive information. WPL makes consistent efforts to maintain the secrecy of this information and restricts the dissemination of this information. Moreover, EGEAS data is generally considered to be a trade secret within the electric utility industry. The EGEAS modeling and assumptions are used by WPL to strategize and negotiate future construction and supply contracts—including for fuel supply and purchased power—in a manner that is cost-effective for customers. For example, a supplier or counterparty could use knowledge of WPL's fuel forecasts or purchase power forecasts (as opposed to using market information) to develop bids or negotiations for fuel or power transactions that will result in greater costs incurred by WPL and its customers. Similarly, if WPL's competitors had knowledge of the EGEAS data, the competitor could understand which resource options WPL might pursue under various situations, and, where the competitor has a need for similar resources, could structure its business plans to acquire such resources in advance and to the disadvantage of WPL. As such, the EGEAS modeling and assumptions constitute a trade secret and information that would or could aid a competitor of a public utility, in this case WPL.

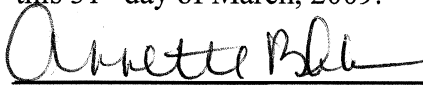
WPL further believes that release of the information for which confidential status is requested would result in harm to the public interest that outweighs any benefit to be gained from making the data public. See State ex rel. Youmans v. Owen, 28 Wis. 2d 672, 137 N.W.2d 470 (1965). As noted above, public release of the EGEAS modeling and assumptions could harm the Company's ratepayers and shareholders by eroding the Company's negotiating position for construction and supply contracts and power transaction contracts, thus increasing costs for ratepayers and shareholders.

Dated this 31<sup>st</sup> day of March, 2009.

WISCONSIN POWER AND LIGHT COMPANY

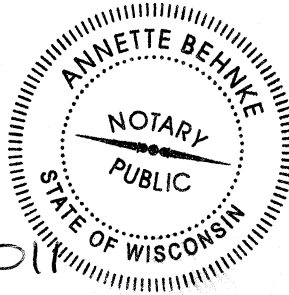
  
Joseph M. Holliman

Subscribed and sworn to before me  
this 31<sup>st</sup> day of March, 2009.



Notary Public, Dane County, Wisconsin

My Commission expires Nov. 20, 2011



**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of Wisconsin Power and Light Company )  
and Wisconsin Electric Power Company for a )  
Certificate of Authority to Install a NO<sub>x</sub> Reduction )  
System, Selective Catalytic Reduction (SCR), at the )  
Edgewater Generating Station on Unit 5 )

Docket No. 5-CE-137

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**APPLICATION OF WISCONSIN POWER AND LIGHT COMPANY ("WPL")  
FOR CONFIDENTIAL STATUS OF ELECTRIC GENERATION EXPANSION  
ANALYSIS SYSTEM (EGEAS) DATA PROVIDED IN RESPONSE TO  
COMMISSION DATA REQUEST NO. 1.16**

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Wisconsin Power and Light Company ("WPL") respectfully submits to the Public Service Commission of Wisconsin ("Commission") this application for confidential status of WPL's Electric Generation Expansion Analysis System ("EGEAS") data as described more fully in the following affidavit of Mr. Joseph M. Holliman. WPL is providing the EGEAS data as an attachment to its response to the Commission's Data Request No. 1.16. This motion is made pursuant to Wis. Stat. §§ 19.36(5) and 196.14, Wis. Admin. Code § PSC 2.12, and public policy supporting confidential treatment of records as outlined in *State ex rel. Youmans v. Owen*, 28 Wis. 2d 672, 137 N.W.2d 470 (1965). This motion is supported by the accompanying affidavit.

Dated this 16<sup>th</sup> day of February, 2009.

WISCONSIN POWER AND LIGHT COMPANY

/s/ Michael S. Greiveldinger  
Michael S. Greiveldinger  
Attorney



### CONFIDENTIALITY AFFIDAVIT

STATE OF WISCONSIN     )  
                                      ) ss.  
COUNTY OF DANE         )

Joseph M. Holliman, being first duly sworn, on oath, deposes and says:

1.     I make this affidavit based upon my personal knowledge.

2.     All of the information contained in this affidavit is true and correct to the best of my knowledge.

3.     The name and address of the applicant seeking confidential treatment of information in this matter are as follows:

Wisconsin Power and Light Company ("WPL")  
4902 North Biltmore Lane  
P.O. Box 77007  
Madison, Wisconsin 53707-1007

4.     I am the individual filing this affidavit on behalf of WPL. My name and position are as follows:

Joseph M. Holliman  
Senior Asset Strategy Consultant  
Alliant Energy Corporate Services, Inc.

5.     Specific Type of Information for Which Confidential Status is Sought:

Attached to this Application is a true and correct copy of WPL's EGEAS data, which WPL is providing in response to the Commission's Data Request No. 1.16. The EGEAS model inputs and outputs include electric generation plant data on fuel prices, outage schedules, purchased power energy prices, and other sensitive information. WPL requests that EGEAS data, being delivered to the Commission today, which is marked confidential, receive confidential treatment by the Commission.

6. Facts and Supporting Legal Authority Constituting Basis for Confidential

Treatment:

Commission Data Request No. 1.16 requests copies of all EGEAS runs performed by WPL for the proposed SCR project at Edgewater Unit 5. Wis. Stat. § 196.14 allows the Commission to withhold from public inspection any information that would aid a competitor of a public utility in competition with that public utility. In addition, Wis. Stat. § 19.36(5) and Wis. Admin. Code § PSC 2.12(3) allow the Commission to withhold access to any record or portion of a record containing information qualifying as a trade secret. Trade secrets are defined in Wis. Stat. § 134.90(1)(c) as meaning information to which all of the following apply:

1. The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
2. The information is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.

To reiterate, the EGEAS data for which confidential treatment is being sought consists of specific electric generation plant data on fuel prices, outage schedules, purchased power energy prices, and other sensitive information. WPL makes consistent efforts to maintain the secrecy of this information and restricts the dissemination of this information. Moreover, this EGEAS data is generally considered to be a trade secret within the electric utility industry. The data is used by WPL to strategize and negotiate future construction and supply contracts—including for fuel supply and purchased power—in a manner that is cost-effective for customers. If WPL's competitors had knowledge of the EGEAS data, they could use this information (as opposed to using market information) to create a competitive disadvantage for WPL and its customers.

WPL further believes that release of the information for which confidential status is requested would result in harm to the public interest that outweighs any benefit to be gained from making the data public. *See State ex rel. Youmans v. Owen*, 28 Wis. 2d 672, 137 N.W.2d 470 (1965). As noted above, public release of the EGEAS data could harm the Company's ratepayers and shareholders by eroding the Company's negotiating position for construction and supply contracts and purchased power contracts—thus, increasing costs for ratepayers and shareholders.

Dated this 16<sup>th</sup> day of February, 2009.

WISCONSIN POWER AND LIGHT COMPANY

/s/ Joseph M. Holliman  
Joseph M. Holliman

Subscribed and sworn to before me  
this 16<sup>th</sup> day of February, 2009.

/s/ Kathy M. Chiono  
Notary Public, Dane County, Wisconsin  
My Commission expires May 10, 2009.

**BEFORE THE**  
**PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of Wisconsin Power and Light Company )  
and Wisconsin Electric Power Company for a )  
Certificate of Authority to Install a NO<sub>x</sub> Reduction )  
System, Selective Catalytic Reduction (SCR), at the )  
Edgewater Generating Station on Unit 5 )

Docket No. 5-CE-137

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**APPLICATION OF WISCONSIN POWER AND LIGHT COMPANY ("WPL")  
FOR CONFIDENTIAL STATUS OF ELECTRIC GENERATION EXPANSION  
ANALYSIS SYSTEM (EGEAS) DATA PROVIDED IN RESPONSE TO  
COMMISSION DATA REQUEST NO. 3.22.**

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Wisconsin Power and Light Company ("WPL") respectfully submits to the Public Service Commission of Wisconsin ("Commission") this application for confidential status of WPL's updated Electric Generation Expansion Analysis System ("EGEAS") data as described more fully in the following affidavit of Mr. Joseph M. Holliman. WPL is providing the updated EGEAS data as an attachment to its response to the Commission's Data Request No. 3.22. This motion is made pursuant to Wis. Stat. §§ 19.36(5) and 196.14, Wis. Admin. Code § PSC 2.12, and public policy supporting confidential treatment of records as outlined in *State ex rel. Youmans v. Owen*, 28 Wis. 2d 672, 137 N.W.2d 470 (1965). This motion is supported by the accompanying affidavit.

Dated this 23<sup>rd</sup> day of March, 2009.

WISCONSIN POWER AND LIGHT COMPANY

/s/ Michael S. Greiveldinger

Michael S. Greiveldinger  
Attorney

### CONFIDENTIALITY AFFIDAVIT

STATE OF WISCONSIN     )  
                                      ) ss.  
COUNTY OF DANE         )

Joseph M. Holliman, being first duly sworn, on oath, deposes and says:

1.     I make this affidavit based upon my personal knowledge.

2.     All of the information contained in this affidavit is true and correct to the best of my knowledge.

3.     The name and address of the applicant seeking confidential treatment of information in this matter are as follows:

Wisconsin Power and Light Company ("WPL")  
4902 North Biltmore Lane  
P.O. Box 77007  
Madison, Wisconsin 53707-1007

4.     I am the individual filing this affidavit on behalf of WPL. My name and position are as follows:

Joseph M. Holliman  
Senior Asset Strategy Consultant  
Alliant Energy Corporate Services, Inc.

5.     Specific Type of Information for Which Confidential Status is Sought:

Attached to this Application is a true and correct copy of WPL's EGEAS data, which WPL is providing in response to the Commission's Data Request No. 3.22. The EGEAS model inputs and outputs include electric generation plant data on fuel prices, outage schedules, purchased power energy prices, and other sensitive information. WPL requests that EGEAS data, being delivered to the Commission today, which is marked confidential, receive confidential treatment by the Commission.

6. Facts and Supporting Legal Authority Constituting Basis for Confidential

Treatment:

Commission Data Request No. 3.22 requests copies of updated EGEAS runs performed by WPL for the proposed SCR project at Edgewater Unit 5. Wis. Stat. § 196.14 allows the Commission to withhold from public inspection any information that would aid a competitor of a public utility in competition with that public utility. In addition, Wis. Stat. § 19.36(5) and Wis. Admin. Code § PSC 2.12(3) allow the Commission to withhold access to any record or portion of a record containing information qualifying as a trade secret. Trade secrets are defined in Wis. Stat. § 134.90(1)(c) as meaning information to which all of the following apply:

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WPL further believes that release of the information for which confidential status is requested would result in harm to the public interest that outweighs any benefit to be gained from making the data public. *See State ex rel. Youmans v. Owen*, 28 Wis. 2d 672, 137 N.W.2d 470 (1965). As noted above, public release of the EGEAS data could harm the Company's ratepayers and shareholders by eroding the Company's negotiating position for construction and supply contracts and purchased power contracts—thus, increasing costs for ratepayers and shareholders.

Dated this 23<sup>rd</sup> day of March, 2009.

WISCONSIN POWER AND LIGHT COMPANY

/s/ Joseph M. Holliman

Joseph M. Holliman

Subscribed and sworn to before me  
this 23<sup>rd</sup> day of March, 2009.

/s/ Annette Behnke

Notary Public, Dane County, Wisconsin

My Commission expires November 20, 2011.

# CONFIDENTIAL ATTACHMENTS

**Response of  
Wisconsin Power and Light Company  
to  
The Public Service Commission of Wisconsin  
Data Request No. 3.22**

Docket Number:	05-CE-137
Date of Request:	March 11, 2009
Information Requested By:	Ken Detmer
Date Responded:	March 23, 2009
Author:	Joe Holliman
Author's Title:	Sr Asset Strategy Consultant
Author's Telephone No.:	(608) 458-3841
Witness: (If other than Author)	

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## **Data Request No. 3.22:**

Provide updated EGEAS analysis without NED 3 and consideration of the other changes discussed during the latest technical discussion between staff and WP&L modeling experts.

## **Response:**

Data Request Response No. 3.22 Attachment A provides a table that summarizes the results of updated EGEAS analyses. Data Request Response No. 3.22 Attachment B outlines the planning alternatives included in the EGEAS analyses. Data Request Response No. 3.22 Attachment C (**CONFIDENTIAL**) is a CD, which is being delivered to the PSCW today, containing the electronic files of the EGEAS analyses.

WPL will run and provide several additional sensitivities regarding the renewal of the Kewaunee PPA.